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Attorney for Claimants Marianas Consultancy Services, LLC and Alfred Yue

**IN THE UNITED STATES DISTRICT COURT
 FOR THE NORTHERN MARIANA ISLANDS**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

\$271,087.88 IN U.S. CURRENCY SEIZED
 FROM BANK OF SAIPAN ACCOUNT NO.
 ENDING IN LAST FOUR DIGITS 0157,
 HELD IN THE NAME OF "MCS"

and

\$39,188.38 IN U.S. CURRENCY SEIZED
 FROM BANK OF SAIPAN ACCOUNT NO.
 ENDING IN LAST FOUR DIGITS 2098,
 HELD IN THE NAME OF "MCS,"

Defendants.

CASE NO. 1:22-cv-00020

**STIPULATED MOTION
 TO CONTINUE DEADLINE
 FOR CLAIMANTS' RESPONSE
 TO VERIFIED COMPLAINT FOR
 FORFEITURE *IN REM***

Date:
 Time:
 Judge:

The United States and Claimants Marianas Consultancy Services, LLC and Alfred Yue, by and through their undersigned counsel, hereby STIPULATE and REQUEST that the Court find good cause and extend the Fed. R. Civ. P. G(5)(b) deadline for Claimants' response to the Government's Verified Complaint for Forfeiture *In Rem* (the "Complaint") in the above-referenced matter.

Claimants timely filed their Claims to the Defendant Property on February 7, 2023 and, pursuant to Rule G(5)(b), Claimants had twenty-one days thereafter in which to file an Answer the Complaint. Due to the complexity of the allegations and the law applicable thereto, on February 23,

1 2023 the parties stipulated to extend the Rule G(5)(b) deadline by one-month to March 31, 2023
2 (ECF No. 9) which Stipulation was granted (ECF No. 10). The court granted an additional, one-
3 week extension to April 7, 2023 was granted, but was ultimately too optimistic a deadline for
4 Claimants' counsel.

5 Despite diligent efforts, Claimants still need additional time to complete and file their
6 response to the Complaint. Given various scheduling issues of counsel, Claimants now request an
7 additional two-week extension of the Rule G(5)(b) deadline which they submit is justified and
8 reasonable under the circumstances. The Government does not object.

9 Accordingly, Claimants and the Government jointly request that the Court find good cause
10 therefor and further extend the Rule G(5)(b) deadline in this case to Friday, April 21, 2023.

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12 Respectfully Stipulated and Requested this 10th day of April, 2023.

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14 */s/ Eric S. O'Malley*

15 _____
16 JESSICA F. WESSLING
ERIC S. O'MALLEY
Attorneys for the United States

/s/ Mark B. Hanson

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18 MARK B. HANSON
19 *Attorney for Claimants*
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